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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

-----x  
In re : Chapter 11  
: Case No. 08-35653 (KRH)  
CIRCUIT CITY STORES, INC., *et al.*<sup>1</sup> :  
: (Jointly Administered)  
Debtors. :  
:-----x

**MOTION FOR ADMISSION OF PEDRO A. JIMENEZ  
AS A FOREIGN ATTORNEY**

Pursuant to Local Rule 2090-1(E)(2) of the United States Bankruptcy Court for the Eastern District of Virginia, Sheila L. Shadmand, Esquire (the “Movant”), a member in good standing of the bar of this Court, hereby moves for the admission of Pedro A. Jiménez, Esquire, to appear as a foreign attorney in the above-captioned proceedings as counsel for Aiptek, Inc.

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<sup>1</sup>

The debtors in these cases (collectively, the “Debtors”), along with the last four digits of each Debtor’s federal tax identification number, are as follows: Circuit City Stores, Inc. (3875), Circuit City Stores West Coast, Inc. (0785), InterTAN, Inc. (0875), Ventoux International, Inc. (1838), Circuit City Purchasing Company, LLC (5170), CC Aviation, LLC (0841), CC Distribution Company of Virginia, Inc. (2821), Circuit City Properties, LLC (3353), Kinzer Technology, LLC (2157), Abbott Advertising Agency, Inc. (4659), Patapsco Designs, Inc. (6796), Sky Venture Corp. (0311), PRAHS, Inc. (n/a), XSStuff, LLC (9263), Mayland MN, LLC (6116), Courchevel, LLC (n/a), Orbyx Electronics, LLC (3360), and Circuit City Stores PR, LLC (5512). The mailing address for Circuit City Stores West Coast, Inc. is 9250 Sheridan Boulevard, Westminster, Colorado 80031. The mailing address for each remaining Debtor was 9950 Mayland Drive, Richmond, Virginia 23233 and currently is 4951 Lake Brook Drive, Glen Allen, Virginia 23060.

In support of this motion, the Movant respectfully certifies as follows:

1. The undersigned is a member in good standing of the Bar of the Bankruptcy Court for the Eastern District of Virginia, and an attorney with the Washington, DC office of the law firm Jones Day.
2. The proposed admittee, Mr. Jiménez, is an attorney with the New York, New York office of the law firm Jones Day. Mr. Jiménez's address is 222 East 41st Street, New York, New York 10017. His telephone number is (212) 326-3939. Mr. Jiménez was admitted to practice law in the State of Florida in 1998 and was admitted to practice law in the State of New York in 2006, and he remains in good standing to practice law in New York. He is admitted to practice in the United States District Court for the Southern District of New York, the United States District Court for the Southern District of Florida, and the United States District Court for the Middle District of Florida.
3. Mr. Jiménez has never been disbarred, suspended or denied admission to practice.
4. Mr. Jiménez is familiar with the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules, and the Federal Rules of Evidence, and he understands that he shall be subject to the disciplinary jurisdiction of this Court.
5. Mr. Jiménez's Application to Qualify as a Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(2) is attached to this Motion as Exhibit A.
6. A proposed order granting the relief requested in this Motion is attached hereto as Exhibit B.
7. It is understood that admission as a foreign attorney does not constitute formal admission to the bar of the United States Bankruptcy Court for the Eastern District of Virginia.

WHEREFORE, the undersigned requests the entry of an order granting Pedro A. Jiménez permission to appear as a foreign attorney in the above-captioned proceedings as counsel for Aiptek, Inc., and grant such other relief as may be necessary and appropriate.

Dated: February 18, 2011

Respectfully Submitted,

/s/ Sheila Shadmand  
Sheila L. Shadmand (VA Bar No. 43639)  
JONES DAY  
51 Louisiana Avenue, N.W.  
Washington, D.C. 20001-2113  
Telephone: (202) 879-3939  
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*COUNSEL FOR AIPTEK, INC.*

**EXHIBIT A**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER  
LOCAL BANKRUPTCY RULE 2090-1(E)(2)

In Case No.: \_\_\_\_\_, \* Case Name \_\_\_\_\_

PERSONAL STATEMENT

FULL NAME (no initials, please) \_\_\_\_\_

Bar Identification Number \_\_\_\_\_ State \_\_\_\_\_

Firm Name \_\_\_\_\_

Firm Phone # \_\_\_\_\_ Direct Dial # \_\_\_\_\_ FAX # \_\_\_\_\_

E-Mail Address \_\_\_\_\_

Office **Mailing** Address \_\_\_\_\_

Name(s) of federal court(s) in which I have been admitted \_\_\_\_\_

I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.

\_\_\_\_\_  
(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Typed or Printed Name)

\**Pro hac vice* admission in a case shall include an adversary proceeding(s) in the case.

Court Use Only:

The motion for admission is GRANTED \_\_\_\_\_ or DENIED \_\_\_\_\_

\_\_\_\_\_  
(Judge's Signature)

\_\_\_\_\_  
(Date)

**EXHIBIT B**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

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In re : Chapter 11  
: Case No. 08-35653 (KRH)  
CIRCUIT CITY STORES, INC., *et al.*, :  
Debtors. : (Jointly Administered)  
:  
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**ORDER GRANTING ADMISSION OF PEDRO A. JIMENEZ  
AS A FOREIGN ATTORNEY**

Upon the Motion for Admission of Pedro A. Jiménez as a Foreign Attorney (the “Motion”) and the representations by counsel Sheila L. Shadmand that Pedro A. Jiménez is a practicing attorney in good standing in the State of New York; it is hereby

ORDERED that the Motion is hereby GRANTED; and it is further

ORDERED that Pedro A. Jiménez may appear and practice as a Foreign Attorney in the above-referenced proceedings and any related adversary litigation on behalf of Aiptek, Inc., pursuant to Local Bankruptcy Rule 2090-1(E)(2).

DATE: \_\_\_\_\_

UNITED STATES BANKRUPTCY JUDGE

I ASK FOR THIS:

/s/ Sheila Shadmand

Sheila L. Shadmand (VA Bar No. 43639)  
JONES DAY  
51 Louisiana Avenue, N.W.  
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Telephone: (202) 879-3939  
Facsimile: (202) 626-1700  
slshadmand@jonesday.com

*COUNSEL FOR AIPTEK, INC.*

**LOCAL RULE 9022-1 CERTIFICATION**

I hereby certify that the foregoing Proposed Order Granting Admission of Pedro A. Jiménez as a Foreign Attorney has been either endorsed or served upon all necessary parties.

/s/ Sheila Shadmand

Sheila L. Shadmand

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 18, 2011, I caused a true and correct copy of the above Motion for Admission of Pedro A. Jiménez as a Foreign Attorney to be electronically filed with the Clerk of the Court using the CM/ECF system, which shall cause notice of electronic filing to be served on all registered users of the ECF system that have filed notices of appearance in this case.

/s/ Sheila Shadmand

Sheila L. Shadmand